

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
Modernizing the E-rate Program for)	WC Docket 13-184
Schools and Libraries)	
and)	
In the Matter of Schools and Libraries)	CC Docket 02-6
Universal Service Support Mechanism)	
and)	
In the Matter of Connect America Fund A)	WC Docket 10-90
National Broadband Plan for Our Future)	
High-Cost Universal Service Support. .)	

COMMENTS OF KEY BRIDGE LLC

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September 28, 2016

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Washington, D.C. 20554**

In the Matter of:)	
Modernizing the E-rate Program for)	WC Docket 13-184
Schools and Libraries.)	

COMMENTS OF KEY BRIDGE LLC

Key Bridge submits these comments in response to the above captioned proceeding and the Commission's recently issued request for comments and the petition which spawned it.^{1,2} Key Bridge wishes the Commission note the following two positions:

1. Key Bridge supports the petition.
2. White Space devices must comply with Part 15, Subpart H rules.

Key Bridge is a leading FCC-certified White Space Database administrator. We facilitate, enable and coordinate unlicensed and licensed use of TV Band White Space spectrum throughout the United States.

Key Bridge supports the Petition.

TV White Space (TVWS) technologies are an affordable solution for extending broadband access and are particularly well suited to the petitioner's application. The petitioner's request to extend off-campus access using E-Rate funds is reasonable and appears to respect the purpose and intent of those funds.

1 See *Wireline Competition Bureau Seeks Comment On Petitions Regarding Off-Campus Use Of Existing E-Rate Supported Connectivity*, DA 16-1051, CC Docket No. 02-6; WC Docket 10-90; WC Docket No. 13-184, Released September 19, 2016 (*Request for Comment*)

2 See *Joint Petition For Clarification Or, In The Alternative, Waiver Of Microsoft Corporation, Mid-Atlantic Broadband Communities Corporation, Charlotte County Public Schools, Halifax County Public Schools, Gcr Company, And Kinex Telecom*, WC Docket No. 13-184, Submitted June 7, 2016 (*Petition*)

White Space devices must comply with Part 15, Subpart H rules.

Around the world, Microsoft is a great proponent of unlicensed TV White Space, operates countless “experimental” white space networks and numerous “experimental” white space databases. That is all fine. However the United States is well beyond “experimental” TV White Space. There are several certified Database providers in operation, numerous commercial access networks employing these unlicensed frequencies, and substantial infrastructure in place to effect spectrum sharing and incumbent user registration, coordination and protection. Today accessing the VHF/UHF bands in the United States is a technically trivial and very low-cost proposition.

Accordingly, the Commission should require than all transmitters operated by the petitioners operate according to the TVWS rules identified in 47 CFR Part 15, Subpart H . Specifically and most importantly, the proposed TVWS devices must comply with and employ channel selection methodology set forth in 47 CFR 15.711.

Under no circumstances should the Commission entertain nor allow “pilot” networks described by the petitioners to operate under special temporary authorization.

Key Bridge supports the petitioner’s request and encourages a favorable finding by the Commission. Key Bridge requests that any transmitters deployed and operated by the petitioner’s comply with existing TVWS rules.

Respectfully submitted.

/s/

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